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October 16, 2020

VIA ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

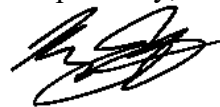
Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

As I have advised the Court and the Government, I have prepared a Rule 33 motion that centers on a potential due process violation stemming from actions taken by the prosecution toward potential defense witnesses. The motion is predicated on affidavits of the potential witnesses, and I am currently waiting for one such affidavit. Given the sentencing date of October 27, 2020, I would ask for a deadline for this motion of Noon on Monday, October 19, 2020.

I thank the Court for its attention to this matter.

Respectfully,



Marc A. Agnifilo, Esq.

cc: AUSA Tanya Hajjar (via ECF and email)